



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES  
NATIONAL INSTITUTE ON DISABILITY AND REHABILITATION RESEARCH

December 22, 2006

BY HAND DELIVERY

Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Reply Comments  
ET Docket No. 06-135 & RM-11271

Dear Chairman Martin:

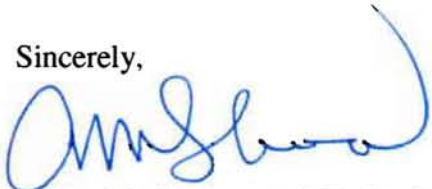
The National Institute on Disability and Rehabilitation Research supports the request that the Commission adopt service rules and allocate up to 20 MHz of spectrum to accommodate new wireless wideband microstimulator devices on a secondary basis. As an agency devoted to research on the needs of individuals with disabilities including disordered motor control and paralysis, we are acutely aware of the need for innovative technologies to ameliorate these disorders. A number of research and clinical facilities are in a position to benefit from the distribution of devices employing this spectrum that are likely to favorably impact functioning in disabled individuals.

The establishment of a service allocation is vital to the development of a new generation of wireless wideband medical devices designed to restore sensation and function to paralyzed limbs and organs. These devices offer a safer, less invasive, and more effective treatment option than is available with existing equipment.

The Commission's rules currently do not provide any spectrum to permit operation of new wireless wideband microstimulator devices. Although the Commission has allocated some spectrum for medical telemetry operations and for medical implant communications services, this spectrum is not suitable for wideband medical implant devices that require larger bandwidths to perform more complex functions. Without adequate spectrum and service rules to support the operation of these innovative devices, millions of Americans will be deprived of a safe and effective medical treatment for their debilitating health conditions.

The Commission's notice of inquiry issued in the above-referenced proceeding is an important first step toward adopting the necessary rules to encourage deployment of the next generation of wireless wideband microstimulator devices. NIDRR urges the Commission to continue its efforts in this area by expeditiously commencing a separate rulemaking on this topic.

Sincerely,



Arthur M. Sherwood, P.E., Ph.D.  
Science and Technology Advisor  
National Institute on Disability and  
Rehabilitation Research



Steven James Tingus, M.S., C.Phil,  
Director  
National Institute on Disability and  
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cc: Marlene H. Dortch  
FCC Secretary